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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

DALE OSBORNE, as Personal Representative of the Estate of Sarah Osborne,)	Cause No. CV-14-126-BLG-SPW
)	Hon. Susan P. Watters
Plaintiff,)	
)	
vs.)	
BILLINGS CLINIC, and UNITED STATES OF AMERICA,)	PLAINTIFFS' NOTICE OF OBJECTION PURSUANT TO STATE COURT PROTECTIVE ORDER (DOCKET NO. 12-5)
Defendants.)	
)	
BILLINGS CLINIC,)	
)	
Cross-Claimant,)	
)	
vs.)	
UNITED STATES OF AMERICA,)	
)	
Cross-Defendant.)	
)	

COME NOW, the Plaintiff, pursuant to the State Court's Order Granting Defendant Billings Clinic's Motion for Protective Order re Policies, and objects to the Defendant's classification of the following documents as "Confidential."

Pursuant to the Protective Order, Billings Clinic is now required to file a Motion for a Protective Order stating the basis for its claim of privilege. [Doc. 12-5 at 4, ¶5].

- CPR Policy; *bates numbered:* BILLINGS CLINIC 67-74;
- Cardiopulmonary Resuscitation (CPR) Education; *bates numbered:* BILLINGS CLINIC 75-77;
- Advanced Cardiac Life Support (ACLS) Requirements; *bates numbered:* BILLINGS CLINIC 78-80;
- Naloxone Treatment of Suspected Opioid-Induced Respiratory Depressions; *bates numbered:* BILLINGS CLINIC 81-83;
- 2012 (Version B) Medical Surgical (Adult) Standards of Practice; *bates numbered:* BILLINGS CLINIC 84-122'
- Analgesic Infusion Pump: Patient Controlled Analgesia (PCA) & Nurse Controlled Analgesia (NCA); *bates numbered:* BILLINGS CLINIC 123-129;
- Billings Clinic Health Information; Let's Talk About Treating Pain Using Patient Controlled Analgesia (PCA); *bates numbered:* BILLINGS CLINIC 130;
- Validation Form – LifeCare PCA Infusion System, Without Hospira MedNet Software Enabled; *bates numbered:* BILLINGS CLINIC 131-134;
- Resident Supervision Guidelines; *bates numbered:* BILLINGS CLINIC 135-136;
- Independent Double Checking of Medications; *bates numbered:* BILLINGS CLINIC 137-139;
- High-Alert (High Risk) and Restricted Medications; *bates numbered:* BILLINGS CLINIC 140-151;
- General Staffing Policy, Hospital; *bates numbered:* BILLINGS CLINIC 152-156;

- Admission, Discharge, and Transfer Policy; *bates numbered*: BILLINGS CLINIC 157-163;
- Physician and Affiliated Healthcare Providers (AHP) Orders for Patient Care; *bates numbered*: BILLINGS CLINIC 164-165.

RESPECTFULLY SUBMITTED THIS 27th day of February 2015.

BEST LAW OFFICES, P.C.

By: /s/ Elizabeth A. Best

Elizabeth A. Best, Esq.

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of February, 2015, a copy of the foregoing document was duly served upon the following persons by the following means:

[**1, 2, 3**] CM/ECF
[] U.S. Mail
[] E-mail
[] Facsimile

1. Clerk of Court
2. Lisa A. Speare, Esq.
William J. Speare, Esq.
SPEARE LAW FIRM, P.C.
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3. Timothy J. Cavan, Esq.
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/s/ Elizabeth A. Best
ELIZABETH A. BEST
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